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March 10, 2014

Hon. Richard J. Sullivan (by email)
United States District Judge
Southern District of New York
40 Centre Street
New York, NY 10007

Re: *United States v. Vilar*, 05 cr 621 (RJS)
Request for bail and appointment of CJA associate

Dear Judge Sullivan:

I write (with the help of a colleague, while I am (today) in wrist surgery) to join in the bail application made by Mr. Tanaka's counsel, Fred Cohn, for bail pending resentencing. I vitally need access to my clients during this period of preparation for resentencing and for the SEC matters. (If it would facilitate bail, I would be willing to have Mr. Vilar stay at my residence during this period.)

I also ask the Court to appoint a second counsel to assist me in the resentencing process. (I note that Mr. Cohn has an associate working with him. I have no associate and no "staff.")

Very truly yours,
/s/
Vivian Shevitz

Cc: Benjamin Naftalis
Justin Anderson
Fred Cohn